

FILED

AUG 14 2012

WILLIAM B. GUTHRIE
Clerk, U.S. District Court
By Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

PRE-PAID LEGAL SERVICES, INC.
Plaintiff

vs.

TODD CAHILL,
Defendant

CASE NO. CIV 12 - 346 - JHP

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant hereby removes to this Court the state court action described below.

1. On August 14, 2012 an action was commenced in the District Court of Pontotoc County, State of Oklahoma entitled Pre-Paid Legal Services, Inc. v. Todd Cahill, Case number CJ-12-166.

2. Defendant received first notice of this case on August 14, 2012 and has been served. This Notice is timely.

3. A copy of all process, pleadings and orders served upon Defendant in the state court action are attached hereto as Exhibit "A".

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1332, and is one which may be removed to this Court by defendant pursuant to the provisions of 28 U.S.C. §1441(b) in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs because Plaintiff is suing Defendant on various theories of recovery for actual damages in excess of \$75,000.00 exclusive of interest and costs. See Petition in paragraph 1.

5. Defendant is informed and believes that Plaintiff, Pre-Paid Legal Services, Inc., was, and still is, a citizen of the State of Oklahoma. Defendant was at the time of the filing of this action, and still is, citizen of the State of California.

WHEREFORE, Defendant, Todd Cahill, prays that this action be removed to the United States District Court for the Eastern District of Oklahoma.

DATED: August 14, 2012.

Respectfully submitted,

WRIGHT, STOUT & WILBURN, PLLC
Attorneys at Law

By: 

Ron Wright OBA #9912

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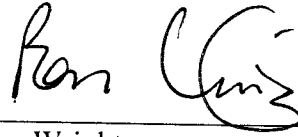
- and -

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The foregoing has been served upon the Plaintiff, by and through its attorney of record, Brooke S. Murphy and Timila S. Rother, Crowe & Dunlevy, P.C., 20 North Broadway, Suite 1800, Oklahoma City, OK, 73102-8273 via certified mail, return receipt requested on this the 14th day of August, 2012.

A handwritten signature in black ink, appearing to read "Ron Wright", written over a horizontal line.

Ron Wright
Gary E. Smith